

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

DILLAN NEWBOLD,)
)
 Plaintiff,) Case No. 4:18-CV-01572-HEA
)
 v.)
)
 CITY OF ST. LOUIS, et al.,)
)
 Defendants.)

CONSENT MOTION FOR ENTRY OF PROTECTIVE ORDER

With the consent of Defendants, Plaintiff Dillan Newbold moves for a protective order upon the following:

1. During the course of this litigation, the parties have or may have been provided or seek to obtain discovery of information that the producing party considers to be personal, confidential, or otherwise sensitive information, including records that one or more of the parties may consider to be closed under the Missouri Sunshine Law or subject to protection under other applicable law.
2. Disclosure of such information to non-parties, even if relevant to this litigation, might be harmful to the parties and/or other individuals.
3. Plaintiff moves for the entry of an order providing a procedure for protecting information that a party designates to be sensitive or confidential. Such an order will facilitate the parties' abilities to proceed with their respective discovery obligations.
4. A proposed protective order is attached as Exhibit 1.
5. Defendants, by and through counsel, have previously agreed to be bound by the terms of this proposed order.

WHEREFORE, Plaintiff moves for entry of the protective order, as proposed in Exhibit 1.

Date: November 7, 2019

Respectfully submitted,

KHAZAEILI WYRSCH, LLC

/s/ Kiara N. Drake

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